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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, *et al.*, individually and
on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING
MOTION TO SEAL**

Judge: Hon. Susan van Keulen, USMJ

[PROPOSED] ORDER

Before the Court is Google LLC's Reply in Support of Motion for Relief Regarding Preservation ("Reply"). Having considered the Reply, supporting declarations, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Document	Text To Be Sealed	Basis for Sealing Portion of Document
Google LLC's Reply in Support of Google's Motion for Relief Regarding Preservation	GRANTED as to the portions at: Pages 1:5-6, 2:3-4, 3:7-8, 3:26 4:7, 4:9-10, 4:18-19, 4:21-25, 4:27, 5:3, 5:7, 5:12-15, 5:18, 6:6-7, 8:14, 9:18, 9:27	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of related Google's internal projects, internal databases, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Declaration of Viola Trebicka in Support of Google LLC's Reply in Support of Motion for Relief Regarding Preservation	GRANTED as to the portions at: Pages 1:16-17, 1:19-20	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of related Google's internal log names, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system

		designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit 1 GOOG-CABR-05290579	GRANTED as to the portions at: Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of related Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit 2 GOOG-CABR-03841078	GRANTED as to the portions at: Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal

		<p>systems and operations, including various types of related Google's internal projects, internal databases, data signals, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.</p>
<p>Exhibit 3 GOOG-CABR-03655476</p>	<p>GRANTED as to the portions at: Sealed Entirely</p>	<p>The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of related Google's internal projects, internal databases, data signals, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk</p>

		of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit 4 .CSV/.PDF data file	GRANTED as to the portions at: Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of related Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
Exhibit 5 .CSV/.PDF data file	GRANTED as to the portions at: Sealed Entirely	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of related Google's internal projects, internal databases, data signals, and logs, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services,

1 and falls within the protected scope of the
2 Protective Order entered in this action. *See*
3 Dkt. 81 at 2-3. Public disclosure of such
4 confidential and proprietary information
5 could affect Google's competitive standing
6 as competitors may alter their systems and
7 practices relating to competing products. It
8 may also place Google at an increased risk
9 of cybersecurity threats, as third parties
10 may seek to use the information to
11 compromise Google's internal practices
12 relating to competing products.

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SO ORDERED.

DATED: _____

HON. SUSAN VAN KEULEN
UNITED STATES MAGISTRATE JUDGE